

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LISA JEANINE FINDLEY,
a/k/a LISA HOLDEN,
a/k/a LISA HOWELL,
a/k/a GREGORY NAUSSANY,
a/k/a KURT NAUSSANY,
a/k/a LISA JEANINE SULLINS,
a/k/a CAROLYN WILLIAMS,

Defendant.

Cr. No.: 24-CR-20145-JTF

18 U.S.C. § 2
18 U.S.C. § 1028A
18 U.S.C. § 1341

INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times material to this Indictment:

The Defendant

1. Defendant LISA JEANINE FINDLEY ("FINDLEY") (also known as "Lisa Holden," "Lisa Howell," "Gregory Naussany," "Kurt Naussany," "Lisa Jeanine Sullins," and "Carolyn Williams") was a resident of Kimberling City, Missouri.

Elvis Presley and Graceland

2. Elvis Presley was a world-renowned singer, actor, and cultural icon. In and around 1957, Mr. Presley purchased an approximately 13.8-acre estate in Memphis, Tennessee, known as "Graceland," as a home for himself and his family. Mr. Presley lived at Graceland for twenty years until his death in August 1977.

3. In and around 1982, Graceland opened to the public. Since then, Graceland has grown to become one of the most visited private homes in America. In and around 1991, Graceland was placed on the National Register of Historic Places. In and around 2006, it was designated by the Secretary of the United States Department of the Interior as a National Historic Landmark.

4. Since Mr. Presley's death, Graceland has remained in Mr. Presley's family. Beginning in and around 1993, Graceland was owned by a revocable trust established by Mr. Presley's only child, L.M.P. After L.M.P.'s death in January 2023, her daughter, D.R.K., became trustee. As trustee, D.R.K. was Graceland's sole owner.

COUNT 1
(Mail Fraud, 18 U.S.C. § 1341)
(Aiding and Abetting, 18 U.S.C. § 2)

5. Paragraphs 1 through 4 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

The Scheme to Defraud

6. From at least in and around January 2023, and continuing through at least in and around August 2024, in the Western District of Tennessee and elsewhere, defendant

LISA JEANINE FINDLEY,

and others known and unknown to the Grand Jury, aided and abetted by each other, did knowingly, and with the intent to defraud, having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing such pretenses, representations, and promises were false and fraudulent when made, placed, and caused

to be placed, in a United States Post Office or authorized depository for mail, a thing to be sent and delivered by the United States Postal Service or any private or commercial interstate carrier, for the purpose of executing such scheme and artifice.

Purpose of the Scheme and Artifice

7. It was the purpose of the scheme and artifice to defraud for FINDLEY, and others known and unknown to the Grand Jury, to enrich themselves unlawfully by, among other things: (i) fraudulently obtaining money and property from Mr. Presley's family; (ii) fraudulently obtaining the ownership interest in Graceland from Mr. Presley's family; (iii) fraudulently selling Graceland to the highest bidder in a public auction; (iv) using the proceeds from the scheme for their own personal benefit; and (v) concealing and disguising from their victims FINDLEY's true identity, the existence of the scheme, and her involvement in the scheme.

The Manner and Means of the Scheme and Artifice

8. It was part of the scheme and artifice to defraud, and among the manner and means by which FINDLEY, and others known and unknown to the Grand Jury, carried out the scheme and artifice, that at least the following occurred.

9. Using a series of aliases, email addresses, and fake documents, FINDLEY engaged in a scheme to defraud Mr. Presley's family for millions of dollars by threatening to foreclose on the "Graceland" estate owned by Mr. Presley's family and auction Graceland to the highest bidder as part of a fraudulent non-judicial sale she scheduled for May 23, 2024. As part of her scheme to defraud:

- a. FINDLEY concealed and disguised from her victims her identity, the existence of the scheme to defraud, and her involvement in the scheme,

by using aliases, including “Gregory Naussany,” “Kurt Naussany,” and “Carolyn Williams,” and email addresses, including:

- “carolyn.williams.niplllc@outlook.com,”
 - “gregoryenaussanyniplflorida@hotmail.com,”
 - “naussanyinvestmentsllc@outlook.com,” and
 - “niplcollections@outlook.com.”
- b. FINDLEY used these aliases and email addresses to create the false and fraudulent impression that “Naussany Investments & Private Lending LLC,” a/k/a “NIPL LLC” (“Naussany Investments”), was a real company engaged in the business of making personal loans.
- c. FINDLEY falsely and fraudulently represented to attorneys for D.R.K. (Mr. Presley’s granddaughter) that, before her death, L.M.P. (Mr. Presley’s daughter and D.R.K.’s mother) had (i) borrowed \$3.8 million from Naussany Investments in 2018, (ii) pledged Graceland as collateral for the loan, and (iii) defaulted on the loan.
- d. FINDLEY used, without lawful authority, L.M.P.’s name and signature, as well as the names, signatures, and notary seals of other real persons, to create fake loan documents purporting to memorialize L.M.P.’s 2018 agreement to borrow \$3.8 million from Naussany Investments and pledge Graceland as collateral for the loan, including a fake promissory note and a fake deed of trust.
- e. FINDLEY used the fake loan documents as part of a false and fraudulent creditor’s claim filed on behalf of Naussany Investments in the Superior

Court of California, County of Los Angeles ("California Superior Court"), in connection with the administration of L.M.P.'s estate. FINDLEY also filed other fake documents in support of Naussany Investments' false and fraudulent creditor's claim, including fake bank records and fake mailing labels.

- f. FINDLEY proposed to D.R.K.'s attorneys, without disclosing that the creditor's claim was false and fraudulent, that she would be agreeable to settling the claim for \$2.85 million, which represented 75% of the amount that FINDLEY falsely and fraudulently claimed that L.M.P. had borrowed from Naussany Investments.
- g. FINDLEY submitted the fake loan documents to the Shelby County Register's Office in Memphis, Tennessee, to fraudulently record the fake deed of trust and facilitate the false and fraudulent sale of Graceland.
- h. FINDLEY published in *The Commercial Appeal* (one of Memphis, Tennessee's daily newspapers) a false and fraudulent "Notice of Foreclosure Sale" that falsely and fraudulently represented to the public that L.M.P. had borrowed \$3.8 million from Naussany Investments in 2018, pledged Graceland as collateral for the loan, and defaulted on the loan. The false and fraudulent "Notice of Foreclosure Sale" also represented to the public that Graceland would be sold to the highest bidder in an auction to be held on May 23, 2024.
- i. After D.R.K. filed a lawsuit in the Shelby County Chancery Court in Memphis, Tennessee to stop the false and fraudulent sale of Graceland,

FINDLEY submitted to the Shelby County Chancery Court filings and documents that contained materially false and fraudulent representations.

- j. After FINDLEY's scheme attracted global media attention, FINDLEY made false and fraudulent representations to D.R.K.'s attorneys, the Shelby County Chancery Court, and the press creating the false and fraudulent impression that the person responsible for the scheme was a Nigerian identity thief located in Nigeria.

Acts in Furtherance of the Scheme and Artifice

10. In furtherance of the scheme and artifice to defraud, FINDLEY committed, or caused to be committed, the following.

January 2023:

FINDLEY Applied for a Post Office Box Used in the Scheme

11. On or about January 27, 2023, FINDLEY applied for Post Office Box ("PO Box") Service at a United States Post Office in and around Hollister, Missouri. In the application, FINDLEY identified "Lisa Holden" as the person applying for the PO Box. The Post Office assigned PO Box #1015 ("PO Box #1").

July 2023:

FINDLEY Created a False and Fraudulent Creditor's Claim and Mailed It to D.R.K.'s Attorneys

12. On or about July 14, 2023, the email address "naussanyinvestmentsllc@outlook.com" was created.

13. On or about July 14, 2023, an individual purporting to be "Kurt Naussany," Chief Lending Officer for Naussany Investments, sent an email to D.R.K.'s attorneys using this newly created Outlook email address. The individual falsely and fraudulently

claimed that L.M.P. had taken a collateral loan with Naussany Investments and defaulted on this debt before her death. The individual threatened to foreclose on the property that had been used as collateral if D.R.K. did not respond within 10 days. In response, D.R.K.'s attorneys asked for more information about the loan.

14. On or about July 28, 2023, the email address "nipcollections@outlook.com" was created.

15. On or about July 28, 2023, a package containing a false and fraudulent "creditor's claim" and supporting documentation was mailed from a United States Post Office in Kimberling City, Missouri to L.M.P.'s business manager in Woodland Hills, California. The false and fraudulent creditor's claim was captioned for filing in the California Superior Court in connection with the administration of L.M.P.'s estate. The false and fraudulent creditor's claim listed "NIPL LLC/[Bank #1]" as the purported claimant and "nipcollections@outlook.com" as NIPL LLC's contact email.

16. In the portion of the false and fraudulent creditor's claim that required the purported claimant to list the "Facts Supporting the Claim," the purported claimant stated:

- a. L.M.P. had borrowed \$3.8 million dollars from Naussany Investments in 2018;
- b. L.M.P. pledged Graceland as collateral for the loan;
- c. L.M.P. defaulted on the loan; and
- d. Naussany Investments mailed letters notifying L.M.P. of the default, and the letters were "refused and returned" by L.M.P. or her representatives.

17. The false and fraudulent creditor's claim was purportedly signed by "Gregory Naussany," listed his title as "Lender," and "declare[d] under the penalty of

perjury under the laws of the State of California that the foregoing [creditor's claim] [was] true and correct." In truth and in fact, FINDLEY knew these representations were false and fraudulent: L.M.P. had not borrowed \$3.8 million from Naussany Investments in 2018; L.M.P. had not pledged Graceland as collateral for the loan; L.M.P. had not defaulted on the loan; and Naussany Investments had not mailed letters notifying L.M.P. of the default and the letters had not been "refused and returned" by L.M.P. or her representatives.

18. Numerous fake documents were attached as supporting documentation for the false and fraudulent creditor's claim, including, among other documents:

- a. A fake "Standard Promissory Note," which purported to memorialize L.M.P.'s 2018 agreement to borrow \$3.8 million from Naussany Investments (the "Promissory Note"). The Promissory Note was purportedly signed by L.M.P. in person in Florida before K.P., a Notary Public for the State of Florida, who purportedly notarized the document.
- b. A fake "Deed of Trust," which purported to memorialize L.M.P.'s pledge of Graceland as collateral for \$3.8 million loan from Naussany Investments (the "Deed of Trust"). The Deed of Trust was purportedly signed by L.M.P. in person in Florida before K.P. and notarized by K.P.
- c. Fake bank records from Bank #1, which purported to document Naussany Investments' disbursement of funds to L.M.P. in the amount of \$3.8 million in 2018 (the "Bank #1 Records").

- d. Three fake mailing labels, which purported to document Naussany Investments' repeated attempts to provide notice to L.M.P. of impending legal action for her default on the \$3.8 million loan (the "Mailing Labels").

FINDLEY knew that the supporting documents accompanying the false and fraudulent creditor's claim were fake because she created them or caused them to be created. FINDLEY also knew that: L.M.P. was a real person; FINDLEY did not have lawful authority to use L.M.P.'s name or signature; K.P. was a real person; and FINDLEY did not have lawful authority to use K.P.'s name, signature, or notary seal.

19. The false and fraudulent creditor's claim included a proposed a settlement:

Lender will agree to a settlement arrangement to not proceed with legal action if the Trustee agrees to pay 75% of the amount that was borrowed from namely L.M.P. and that settlement amount being \$2,850,000.00.

September 2023:

***FINDLEY Filed the False and Fraudulent Creditor's Claim
with the California Superior Court***

20. On or about September 18, 2023, the false and fraudulent creditor's claim together with the fake supporting documentation was filed with the California Superior Court. In the portion of the false and fraudulent creditor's claim that required the claimant to list the "Facts Supporting the Claim," the purported claimant repeated the same false and fraudulent representations contained in the copy of the false and fraudulent creditor's claim mailed to D.R.K. on or about July 28, 2023, namely that:

- a. L.M.P. had borrowed \$3.8 million dollars from Naussany Investments in 2018;
- b. L.M.P. pledged Graceland as collateral for the loan;
- c. L.M.P. defaulted on the loan; and

- d. Naussany Investments mailed letters notifying L.M.P. of the default and the letters were “refused and returned” by L.M.P. or her representatives.

21. The filed version of the false and fraudulent creditor’s claim listed PO Box #1 as Naussany Investments’ business address, was signed by an individual purporting to be “Carolyn Williams Sr Collections Officer,” and “declare[d] under the penalty of perjury under the laws of the State of California that the foregoing [creditor’s claim] [was] true and correct.” In truth and in fact, FINDLEY knew all these representations were false and fraudulent: L.M.P. had not borrowed \$3.8 million from Naussany Investments in 2018; L.M.P. had not pledged Graceland as collateral for the loan; L.M.P. had not defaulted on the loan; and Naussany Investments had not mailed letters notifying L.M.P. of the default and the letters had not been “refused and returned” by L.M.P. or her representatives.

22. Numerous fake documents were submitted as supporting documentation for the false and fraudulent creditor’s claim, including among other documents:

- a. The fake Promissory Note, purportedly signed by L.M.P. and purportedly signed and notarized by K.P.
- b. The fake Deed of Trust, purportedly signed by L.M.P. and purportedly signed and notarized by K.P.
- c. The fake Loan Agreement, purportedly signed by L.M.P.
- d. The fake Bank #1 Records.
- e. The fake Mailing Labels.

FINDLEY knew that all the documents attached to the false and fraudulent creditor's claim filed in California Superior Court were fake because she created them or caused them to be created. FINDLEY also knew that: L.M.P. was a real person; FINDLEY did not have lawful authority to use L.M.P.'s name or signature; K.P. was a real person; and FINDLEY did not have lawful authority to use K.P.'s name, signature, or notary seal.

23. At the end of the false and fraudulent creditor's claim, it contained another proposal to settle its claim for \$2,850,000.00.

24. On or about September 19, 2023, one day after the alias "Carolyn Williams" was used to file the false and fraudulent creditor's claim in California Superior Court, the email address "carolyn.williams.niplllc@outlook.com" was created.

November-December 2023:

***FINDLEY Applied for a Second PO Box Used in the Scheme,
and Sent False and Fraudulent Documents to the Shelby County Register's Office***

25. On or about November 30, 2023, FINDLEY applied for another PO Box, this time in and around Kimberling City, Missouri. In the application, FINDLEY represented that the service was for business use by "NIPL LLC," identified "Lisa Findley" as NIPL LLC's "CEO," and listed "naussanyinvestmentsllc@outlook.com" as NIPL LLC's email address. The Post Office assigned PO Box #514 ("PO Box #2") to NIPL LLC.

26. Later that day, on or about November 30, 2023, FINDLEY placed in a United States Post Office in Kimberling City, Missouri, a package that was sent and delivered by the United States Postal Service via Certified Mail to an address in Memphis, Tennessee (the "November 30, 2023 Package"). The mailing label, addressed to "Shelby County Register," stated that the sender was "NIPL LLC." FINDLEY used as NIPL LLC's business address the PO Box FINDLEY had rented earlier that day: PO Box #2. The

package contained a document titled "Authorization Agreement for Direct Payments (ACH Debits) FY24," which authorized the Shelby County Register's Office to debit NIPL LLC's account at Bank #2 for the payment of any fees incurred by NIPL LLC. The agreement was signed using the alias "Carolyn Williams."

27. In and around December 2023, an individual purporting to be "Carolyn Williams" telephoned the Shelby County Register's Office with questions about setting up an e-file account and e-filing the fake Deed of Trust.

28. Also in and around December 2023, an individual sent numerous emails about the fake Promissory Note and fake Deed of Trust using the alias "Carolyn Williams" at "carolyn.williams.niplllc@outlook.com" to the Shelby County Register's Office. For example, on or about December 19, 2023, an email was sent from "Carolyn Williams" attaching a copy of the fake Promissory Note and fake Deed of Trust. The fake Deed of Trust was modified to include a handwritten note listing as NIPL LLC's address "[PO Box #2], Kimberling City, MO."

29. Further, an individual using the alias "Carolyn Williams" executed two false and fraudulent affidavits that accompanied the fake Promissory Note and fake Deed of Trust that was emailed to the Shelby County Register's Office, each of which falsely and fraudulently represented:

I, Carolyn Williams, do hereby make oath that I am a licensed attorney and/or the custodian of the original version of the electronic document tendered for registration herewith and that this electronic document is a true and exact copy of the original document executed and authenticated according to law on December 15, 2023.

In truth and in fact, FINDLEY knew these affidavits were false and fraudulent. FINDLEY knew the Promissory Note and Deed of Trust were fake because she created them or caused them to be created.

January-April 2024:
***FINDLEY Repeatedly Threatened to Foreclose on Graceland
and Prepared to Conduct a Fraudulent Auction of Graceland***

30. On or about January 16, 2024, an email was sent from an individual purporting to be "Kurt Naussany" at "naussanyinvestmentsllc@outlook.com" to D.R.K.'s attorneys threatening to foreclose on Graceland:

[A]s of [the] date the Loan has not been taken care of which has left us no choice but to Advertise the Notice of Foreclosure Sale, February 20, 2024, in the Tennessee Tribune. The Loan is seriously in default and creditors claim has been filed with also being ignored. Copies of the loan documents have been mailed out certified mail to [D.R.K.] again with no response.

31. On or about January 31, 2024, a second false and fraudulent creditor's claim was filed in California Superior Court that repeated the false and fraudulent representations made in the false and fraudulent creditor's claim previously filed on or about September 18, 2023 in California Superior Court. It listed PO Box #2, Kimberling City, Missouri as Naussany Investments' address.

32. Also on or about January 31, 2024, fees were paid to the California Superior Court using a checking account at Bank #2 (the same bank described above in paragraph 26) in the name of "Lisa Holden."

33. On or about April 18, 2024, an individual purporting to be "Kurt Naussany" sent an email from "naussanyinvestmentsllc@outlook.com" to D.R.K.'s attorneys

repeating the threat to take Graceland from Mr. Presley's family and sell it to the highest bidder:

Please be advised that we have made numerous attempts to settle the Creditors Claim with your Client [D.R.K.], Trustee We are now prepared to Foreclose on secured property Graceland and hold Public Auction in 20 (twenty) days. We have tried relentlessly reaching out and no cooperation.

Regards
K. Naussany
Naussany Investments LLC

Disclaimer: With a **nonjudicial foreclosure**, court action isn't required. Instead, the bank will follow the out-of-court process outlined in state law. After completing the required state procedures, the bank will sell the property at a foreclosure sale.

In Tennessee, most banks use the nonjudicial process because it's faster and cheaper than litigating a lawsuit.

Nonjudicial process: The lender gives the homeowner notice of their intent to foreclose, and the process proceeds without further input from the court.

May 2024:

FINDLEY Made False and Fraudulent Representations to D.R.K.'s Attorneys, Filed False and Fraudulent Court Filings in the Shelby County Chancery Court, and Made False and Fraudulent Representations to the Press

34. On or about May 2, 2024, an individual purporting to be J.O. placed an order to publish a false and fraudulent "Notice of Foreclosure Sale" in *The Commercial Appeal* on May 5, 2024, May 12, 2024, and May 19, 2024, respectively. The false and fraudulent "Notice of Foreclosure Sale" falsely and fraudulently represented to the public that L.M.P. had borrowed \$3.8 million from Naussany Investments in 2018, pledged Graceland as collateral for the loan, and defaulted on the loan. The false and fraudulent "Notice of

Foreclosure Sale” also announced to the public that Graceland would be sold to the highest bidder in an auction to be held on May 23, 2024.

35. Later that day, on or about May 2, 2024, an individual purporting to be “Carolyn Williams” sent an email from “carolyn.williams.nipllc@outlook.com” to D.R.K.’s attorneys attaching a copy of the false and fraudulent “Notice of Foreclosure Sale,” the receipt reflecting the order to publish it in *The Commercial Appeal*, and the publication schedule.

36. On or about May 13, 2024, an individual purporting to be “Carolyn Williams” sent an email from “carolyn.williams.nipllc@outlook.com” to D.R.K.’s attorneys stating that Naussany Investments had already published two of the three foreclosure notices and was on the verge of publishing the third and final notice and holding the auction:

Please take notice that the Foreclosure Notice has run 2 weeks now and the 3rd and final is May 19. The Trustee [D.R.K.] has been sent multiple certified letters return receipt with no response from her. As you are aware the loan given to [L.M.P.] is and has been defaulted. Bidding takes place May 23, 2024 from 10am to 12 pm to highest bidder.

37. On or about May 15, 2024, D.R.K. filed a lawsuit in the Shelby County Chancery Court in Memphis, Tennessee, alleging in sum and substance that Naussany Investments was a false and fraudulent entity created for the purpose of defrauding Mr. Presley’s family and any potential purchaser of Graceland in the non-judicial foreclosure sale then-scheduled for May 23, 2024. D.R.K. sought to enjoin the auction. D.R.K. attached an affidavit from K.P. stating in sum and substance that K.P. had not notarized the purported Promissory Note, had never met L.M.P., and had never notarized any document signed by L.M.P.

38. On or about May 15, 2024, Chancellor JoeDae L. Jenkins issued an order temporarily enjoining “Kurt Naussany” and Naussany Investments from conducting a non-judicial foreclosure sale of Graceland pending an in-person hearing that the Chancellor scheduled for May 22, 2024.

39. On or about May 20, 2024, in response to an inquiry from a CBS News producer seeking comment on D.R.K.’s lawsuit, an individual purporting to be “Carolyn Williams” and “Kurt Naussany” repeated the false and fraudulent representation that “Carolyn Williams” and “Kurt Naussany” were involved in making loans on behalf of Naussany Investments to L.M.P.:

- a. An individual purporting to be “Carolyn Williams” sent an email from “carolyn.williams.niplllc@outlook.com” stating that while she had “no knowledge of any filing in Chauncery [sic] Court in Shelby County,” she believed “[t]he daughter is just trying to get out of paying her mothers [sic] bills it seems[.]” She added that “Mr. Naussany has known [L.M.P.] since martiage [sic] to Michael Jackson. ... We do have documentation and witnesses that can verify [L.M.P.] in our Florida office in 2018. ...[L.M.P.] has taken out several loans with Naussany Investments.”
- b. An individual purporting to be “Kurt Naussany” sent a separate email from “naussanyinvestmentsllc@outlook.com” asking when CBS News planned to air the story so that Naussany Investments could notify Bank #1 and Bank #3, “since they back [Naussany Investments’] loans.”

40. Later that day, on or about May 20, 2024, in response to a communication from the CBS News producer informing “Carolyn Williams” and “Kurt Naussany” that a story would air on television and asking whether they had any response to K.P.’s sworn affidavit stating that K.P. had not notarized the purported Promissory Note, had not met L.M.P., and had not notarized any documents signed by L.M.P., an individual purporting to be “Carolyn Williams” and “Kurt Naussany” emailed the CBS News producer with a changed story:

- a. An individual purporting to be “Carolyn Williams” sent an email from “carolyn.williams.nipllc@outlook.com” denying any involvement in the loan to L.M.P. and blaming “Gregory Naussany”:

I myself did not do the loan, although I have known [L.M.P.] for many years. I believe Greg Naussany did the loan process. Greg and I are no longer partnered together. I have ventured out, [s]o whoever is filing paperwork may need to look at documents again. Greg Naussany works out of Jacksonville Florida office with another partner. So, they obviously have wrong information and wrong Naussany Investments.

- b. An individual purporting to be “Kurt Naussany” sent an email from “naussanyinvestmentsllc@outlook.com” similarly denying any involvement in the loan to L.M.P. and blaming “Gregory Naussany”:

I’m only going to state this, [D.R.K.] will need to contact Gregory Naussany in Jacksonville Florida. My name should not appear on anything with NAUSSANY INVESTMENTS AND PRIVATE LENDING LLC! That is not my investment company and has not been since 2015! My investment company is located on the West Coast. I did not sign any paperwork with [L.M.P.]. So please get the story straight before defamation charges come about.

41. On or about May 21, 2024, the email address "gregoryenaussanyniplflorida@hotmail.com" was created.

42. Also on or about May 21, 2024, papers were electronically filed with the Florida Department of State creating a limited liability company named "Naussany Investments & Private Lending, LLC."

43. Later on or about May 21, 2024, an individual purporting to be "Kurt Naussany" began responding to media inquiries sent to "naussanyinvestmentsllc@outlook.com" by directing them to "Gregory E. Naussany" in Jacksonville, Florida at "gregoryenaussanyniplflorida@hotmail.com." An individual purporting to be "Gregory Naussany" then sent emails from "gregoryenaussanyniplflorida@hotmail.com" stating that "Carolyn Williams" and "Kurt Naussany" had not been involved with Naussany Investments since 2015 and accepting personal responsibility for the loans made to L.M.P.

44. Later on or about May 21, 2024, an individual purporting to be "Gregory Naussany" sent an email from "gregoryenaussanyniplflorida@hotmail.com" to D.R.K.'s attorneys falsely and fraudulently representing that "Gregory Naussany" had approved the \$3.8 million loan to L.M.P. and that neither "Kurt Naussany" nor "Carolyn Williams" have been with Naussany Investments since 2015. The individual purporting to be "Gregory Naussany" then repeated the false and fraudulent representation that L.M.P., or "LMP" as she called her, had a history of borrowing money from Naussany Investments and had defaulted on the most recent loan:

Please be advised that this is not the first loan or money borrowed by LMP. I will be calling for all files from micro film [sic] in morning on LMP, for each loan she has taken out with my company. LMP borrowing habits became more frequent

in 2008. We had sent multiple certified mailing's [sic] out to LMP, each mailing was either returned [sic] refused, not excepted [sic], there were emails sent to LMP and again with no response. I will also be contacting my banks that back my loans to pull all cashier's checks made out to LMP.

The individual also proposed to settle with D.R.K. for \$2,850,000, writing:

I have given the option for the trust to pay 75% of the loan in the creditors claim filed.

45. Later on or about May 21, 2024, an individual purporting to be "Gregory Naussany" filed in the Shelby County Chancery Court a one-page response denying D.R.K.'s allegations that Naussany Investments' claims were false and fraudulent. The filing was signed using the alias "Gregory Naussany" and listed as his email address gregoryenaussanyniplflorida@hotmail.com.

46. On or about May 22, 2024, Chancellor Jenkins held a hearing on D.R.K.'s lawsuit in Shelby County Chancery Court. No one appeared on behalf of "Gregory Naussany" or Naussany Investments. Chancellor Jenkins subsequently issued an order enjoining Naussany Investments from conducting a non-judicial foreclosure sale of Graceland.

47. Later on or about May 22, 2024, an individual purporting to be "Gregory Naussany" sent an email from "gregoryenaussanyniplflorida@hotmail.com" to D.R.K.'s attorneys stating that Naussany Investments was dismissing its creditor's claim.

48. Beginning on or about May 24, 2024, and continuing through at least May 29, 2024, the individual who had previously claimed to be "Gregory Naussany" made false and fraudulent representations to D.R.K.'s attorneys, the Shelby County Chancery Court, and the press creating the false and fraudulent impression that the person responsible for the scheme was a Nigerian identity thief located in Nigeria.

49. Specifically, the individual who previously claimed to be "Gregory Naussany" sent messages, written in different foreign languages, in which the individual purported to be the Nigeria-based identity thief. These messages were sent via fax and from "gregoryenaussanyniplflorida@hotmail.com."

Use of the Mails

50. On or about November 30, 2023, in the Western District of Tennessee and elsewhere, defendant

LISA JEANINE FINDLEY,

and others known and unknown to the Grand Jury, aided and abetted by each other, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, did knowingly place and cause to be placed in a United States Post Office or authorized depository for mail a thing to be sent and delivered by the United States Postal Service or any private or commercial interstate carrier, to wit a document titled "Authorization Agreement for Direct Payments (ACH Debits) FY24" sent and delivered by the United States Postal Service via Certified Mail from NIPL LLC, PO Box #2, Kimberling City, Missouri to the Shelby County Register's Office at an address in Memphis, Tennessee.

All in violation of Title 18, United States Code, Section 1341 and Title 18, United States Code, Section 2.

COUNT 2
(Aggravated Identity Theft, 18 U.S.C. § 1028A)
(Aiding and Abetting, 18 U.S.C. § 2)

51. Paragraphs 1 through 4 and 6 through 50 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

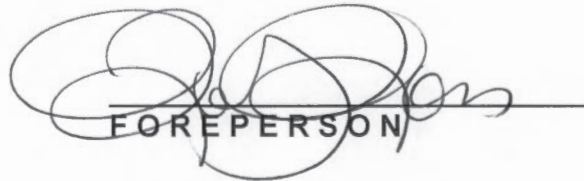
52. From at least in and around January 2023 and continuing through at least in and around August 2024, in the Western District of Tennessee and elsewhere, defendant

LISA JEANINE FINDLEY,

and others known and unknown to the Grand Jury, aided and abetted by each other, knowingly transferred, possessed, and used, and knowingly caused to be transferred, possessed, and used, without lawful authority, a means of identification that defendant FINDLEY knew belonged to another person, namely, the name of L.M.P., during and in relation to mail fraud, a felony violation of Title 18, United States Code, Section 1341, as charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 1028A and Title 18, United States Code, Section 2.

A TRUE BILL:



FOREPERSON

DATED: September 10, 2024

Glenn Leon

Digitally signed by Glenn Leon
Date: 2024.09.09 10:24:19
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GLENN S. LEON
CHIEF
U.S. DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION

KEVIN RITZ

Digitally signed by KEVIN RITZ
Date: 2024.09.06 15:40:44
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KEVIN G. RITZ
UNITED STATES ATTORNEY
WESTERN DISTRICT OF TENNESSEE